

**IN THE UNITED DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

CHARLES L. TAYLOR,

Petitioner,

Case No.3:12MJ230

v.

UNITED STATES OF AMERICA,

To the Honorable Judge of Said Court:

**MOTION FOR AN ORDER OF EXPUNGEMENT AND
SEALED**

COMES NOW Plaintiff, CHARLES L. TAYLOR, and represents unto this Honorable Court as follows:

1. That your Plaintiff, CHARLES L. TAYLOR was born on July 6, 1960.
2. That on May 16, 2012 in the Eastern District of Virginia at Fort Lee, Virginia Property administered by the Department of Defense, in the Eastern District of Virginia, and within the special territorial jurisdiction of the United States, your Petitioner was Charged with an assault in violation of Title 18, United States Code, Section 113(a)(4).
3. That on July 16, 2012 a trial was held in the United States District Court for the Eastern District of Virginia and the matter was taken under advisement for a period of

time with the understanding that the case would be dismissed if Plaintiff complied with the various terms including not violating any federal, state or local laws.

4. Plaintiff complied and the case was dismissed with prejudice on October 25, 2012.

5. The prosecutor and Plaintiff's supervisor at the time, Carlos Ramirez -Vasquez told him that he knew Plaintiff was innocent.

6. That the continued existence and possible dissemination of information relating to the arrest of Plaintiff for assault causes or may cause circumstances which constitute and manifest injustice to the Plaintiff

7. No government interest in maintaining the records exist.

8. Records could cause professional embarrassment to Plaintiff in his career as a paralegal.

WHEREFORE, your Petitioner prays that the police and court records relating to the aforesaid charges be expunged and sealed and that a copy of any Order of Expungement be forwarded to the National Crime Information Center (NCIC).

Respectfully Submitted,
CHARLES L. TAYLOR

By:/s/ Verbena M. Askew
Verbena M. Askew, Esquire (VSB# 19511)
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 6th day of February, 2014, a true and correct copy of the above and foregoing was electronically filed with the Clerk of the Court using CM/ECF system and served upon opposing counsel and counsel for the United States of America using the CaseFileXpress electronic filing system.

/s/ Verbena M. Askew

Verbena M. askew